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IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF OREGON  
PORTLAND DIVISION

PAUL GALM, personal representative for the  
estate of DYLLAN NANOSKI,

Plaintiff,

v.

STATE OF OREGON, by and through the  
Oregon Youth Authority; JOHN MALONE, in  
his individual capacity; SHANNON  
MOSHOFISKY in her individual capacity;  
STACEY VERNER in her individual capacity;  
GILBERTO DE JESUS-RENTAS, in his  
individual capacity; DANIEL BERGER, in his  
official and individual capacity; TARA  
WILLIAMS in her individual capacity; and  
LARA DOREGIOS, in her individual  
capacity,

Defendants.

Case No. xxx

NOTICE OF REMOVAL OF ACTION  
PURSUANT TO 28 U.S.C. §§ 1331 AND  
1446

PLEASE TAKE NOTICE that Defendants State of Oregon, John Malone, Shannon  
Moshofsky, Stacey Varner, Daniel Berger, Tara Williams, and Lara Doregios, hereby remove the

above-captioned civil case, *Paul Galm, PR for the Estate of Dyllan Nanoski v. State of Oregon, et al.*, Multnomah County Circuit Court Case No. 22CV43249, to the United States District Court for the District of Oregon, Portland Division, pursuant to 28 U.S.C. §§ 1331 and 1446. The grounds for removal are as follows:

1. On December 21, 2022, plaintiff filed its complaint in the Multnomah County Circuit Court Case No. 22CV43249. The complaint contains claims for violations of the United States Constitution, as well as Oregon state law claims, based on State of Oregon's actions in Multnomah County. This Court has jurisdiction over the federal constitutional claims under 28 U.S.C. § 1331, as those claims raise federal questions. This Court has supplemental jurisdiction over the state law claims pursuant to 28 U.S.C. § 1367(a). A copy of the complaint is attached as **Exhibit 1**.

2. Copies of all process, pleadings, and orders served on Defendant in the state action are attached as described below.

3. The Proof of Service, filed on January 9, 2023, is attached as **Exhibit 2**.

4. The Summons, filed on January 9, 2023, is attached as **Exhibit 3**.

5. The Answer, filed on January 30, 2023, is attached as **Exhibit 4**.

6. The Order Appointing Judge Andrew Lavin filed on February 7, 2023, is attached as **Exhibit 5**.

7. The Protective Order, filed on March 24, 2023, is attached as **Exhibit 6**.

8. The Unopposed Motion to Allow Plaintiff's Amended Complaint and Adding Defendants (ORCP 23 & ORCP 30), filed on May 31, 2023, is attached as **Exhibit 7**.

9. The Order Granting Unopposed Motion to Allow Plaintiff's Amended Complaint and Adding Defendants (ORCP 23 & ORCP 30), filed on June 2, 2023, is attached as **Exhibit 8**.

10. The First Amended Complaint, filed on June 12, 2023, is attached as **Exhibit 9**.

11. The Acceptance of Service for defendants, filed on June 22, 2023, is attached as **Exhibit 10.**

12. The Summons to Defendant John Malone, filed on June 22, 2023, is attached as **Exhibit 11.**

13. The Summons to Defendant Shannon Moshofsky, filed on June 22, 2023, is attached as **Exhibit 12.**

14. The Summons to Defendant Stacey Varner, filed on June 22, 2023, is attached as **Exhibit 13.**

15. The Summons to Defendant Daniel Berger, filed on June 22, 2023, is attached as **Exhibit 14.**

16. The Summons to Defendant Lara Doregios, filed on June 22, 2023, is attached as **Exhibit 15.**

17. The Summons to Defendant Tara Williams, filed on June 22, 2023, is attached as **Exhibit 16.**

WHEREFORE, the above-captioned case is removed from the Multnomah County Circuit Court and to the U.S. District Court for the District of Oregon.

DATED June 30, 2023.

Respectfully submitted,

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Attorney General

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